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Counsel for Defendant Trans Union, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

	_____	DIVISION	
DARLENE ROWLEY,)		CASE NO.
Plaintiff,)		
)		
vs.)		TRANS UNION, LLC’S NOTICE
)		OF REMOVAL
EXPERIAN INFORMATION SOLUTIONS, INC.;)		
EQUIFAX, INC.; TRANSUNION, LLC;)		
CAPITAL ONE, NATIONAL ASSOCIATION;)		
CREDIT ONE BANK, NATIONAL)		
ASSOCIATION; WEBBANK; PATIENT)		
ACCOUNTING SERVICE CENTER; and DOES 1)		
through 100, inclusive;)		
Defendants.)		

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC, (“Trans Union”) hereby removes the subject action from the Santa Clara County, Superior Court of California, to the United States District Court for the Northern District of California, on the following grounds:

1. Plaintiff Darlene Rowley served Trans Union on or about September 18, 2015, with a Summons, Complaint For Damages, Alternative Dispute Resolution Information Sheet and Civil Lawsuit Notice filed in the Santa Clara County, Superior Court of California. Copies of the Summons, Complaint for Damages, Alternative Dispute Resolution Information Sheet and Civil Lawsuit Notice are attached hereto as **Exhibit A**, **Exhibit B**, **Exhibit C** and **Exhibit D**, respectively. No other process, pleadings or orders have been served on Trans Union.

TRANS UNION, LLC’S NOTICE OF REMOVAL

1 2. Plaintiff makes claims under, alleges that Trans Union violated and alleges that
2 Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the
3 “FCRA”). See Complaint ¶¶ 1, 13, 17 and 21-24.

4 3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C.
5 § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus
6 supplies this federal question.
7

8 4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Santa
9 Clara County, Superior Court of California, to the United States District Court for the Northern
10 District of California.

11 5. To the best of Trans Union’s knowledge, the other named Defendants in this
12 matter have not been served as of the date and time of this Notice Of Removal. Trans Union
13 has confirmed with the Clerk of Santa Clara County, Superior Court of California, both online
14 and by telephone, that they have no document or file suggesting any other Defendant has been
15 served.
16

17 6. Notice of this removal will promptly be filed with the Santa Clara County,
18 Superior Court of California and served upon all adverse parties.
19

20 WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action
21 from the Santa Clara County, Superior Court of California to this United States District Court,
22 Northern District of California.
23

Respectfully submitted,

Date: September 22, 2015

s/ Lauren E. Tate

Lauren E. Tate, Esq. (CSB #124483)

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Counsel for Defendant, Trans Union, LLC

PROOF OF SERVICE

I, Lauren E. Tate, declare that I am a resident of the State of California, am over the age of eighteen years and am not a party to the within action. I am employed with Tate and Associates, whose address is 1321 8th Street, Suite 4, Berkeley, CA. On **September 22, 2015**, I served the following documents:

TRANS UNION, LLC'S NOTICE OF REMOVAL

I served the documents on the persons listed below, as follows:

[]	By messenger service. I served the documents by placing them in an envelope or package addressed to the persons listed below and providing them to a professional messenger service for service. (A declaration by the messenger is attached hereto as a separate document.)
[X]	By United States mail. I enclosed the documents in a sealed envelope or package addressed to the persons listed below and placed the envelope or package for collection and mailing in accordance with our ordinary business practices. I am readily familiar with my firm's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Berkeley, CA.

All documents were sent to the following persons in the following manner:

Scott J. Sagaria, Esq.
 Elliot W. Gale, Esq.
 Sagaria Law, P.C.
 2033 Gateway Place, 5th Floor
 San Jose, CA 95110

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this Proof of Service was executed on this **22nd** day of **September, 2015**, at Berkeley, CA.

TRANS UNION, LLC'S NOTICE OF REMOVAL

1 s/ Lauren E. Tate
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Counsel for Defendant, Trans Union, LLC